



Jan 28, 2022

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

RE: Request to FCC from the National Digital Inclusion Alliance to publish and increase usability of its existing Internet Access Services data for the purposes of measuring broadband adoption nationwide.

Dear Ms. Dortch,

The need for robust, accurate, and timely broadband adoption data has never been more acute.

Through the Infrastructure Investment and Jobs Act (IIJA), Congress allocated the largest investment in broadband and digital equity in history. Increases in broadband adoption represent the most fundamental measure of the progress and impact of the IIJA programs, but to track progress, robust, accurate, and timely broadband adoption data is needed.

The decision by the U.S. Census not to release 2020 American Community Survey (ACS) 1-Year Estimates comes at a particularly bad time for states and communities engaged in digital inclusion efforts, as they prepare for implementation of the IIJA. The ACS 1-Year Estimates remain the sole nationwide data set with current, community-level data on household internet adoption. The Census Bureau's failure to update this data for 2020 leaves a significant gap in our understanding of broadband adoption patterns at the state and local levels and how those patterns may have shifted during the first nine months of the COVID pandemic. The lack of 2020 community-level ACS data, is a one-time challenge stemming from data collection issues during the COVID-19 pandemic; however it is a precursor to concerns about the longer-term reliability of broadband adoption data from the ACS. The Census Bureau's application of new disclosure avoidance measures (introducing statistical "noise" into the data to protect individuals' privacy) in the 2020 Decennial Census has resulted in serious concerns about the usability of that data for local-level analyses. The Census Bureau has indicated that it plans to apply new disclosure avoidance measures to future ACS releases as well, which raises additional concerns as the ACS is already a survey with sizable margins of error for small geographies and population groups. Should the Census Bureau proceed as expected, local-level ACS data on broadband adoption will become unreliable and potentially unusable for understanding the digital inclusion needs of communities and key population groups.

The decreased usability of ACS data elevates the importance of the Form 477 adoption data, as it represents the only other authoritative nationwide dataset on broadband adoption at the granularity necessary for local-level analysis. The Federal Communications Commission is in a unique position to help fill this important information gap.

The FCC already uses Form 477 to collect Census tract-level data from regulated fixed-broadband providers on the number of households they serve at a variety of benchmark speed levels (5 thresholds for downstream speeds and 4 for upstream speeds). This data is used to create fairly detailed nationwide analyses which are published in the Internet Access Services Reports (IASRs). An accompanying interactive national color-coded map with aggregated data of “Residential Fixed Internet Access Service Connections per 1000 Households by Census Tract” is valuable for helping to visualize the data. However, the most recent map includes just two speed tiers (connections “exceeding 200 kbps in at least one direction” and “at least 10 Mbps downstream/1 Mbps upstream”), offers limited map functionality, and does not provide access to the underlying data, all of which limit the utility of the map for users. An IASR and associated map set have been published for each bi-annual Form 477 data collection, but only through December 2018 – which is now two years older than the most recent release of Form 477 data on deployment, containing data for December 2020 (see [here](#)).

To meet this need, we request the following:

1) Release the actual IASR datasets, not just the mapping codes. At a minimum, for each Census tract, the public dataset should include the aggregate total number of fixed home broadband connections at each speed benchmark for which those numbers were reported.

2) Make some simple changes to improve usability of the Internet Access Services map on the FCC’s website:

- Rather than the current symbology, which displays ranges of fixed internet connections per 1,000 households, provide two layers with more intuitive measures:
 - Adoption rates (i.e. percent of households with fixed connections at selected connection speeds) with percent ranges not larger than deciles, but ideally even smaller.
 - Number of households lacking a fixed internet connection (i.e. total households minus number of households with fixed connections).
- Add the ability to select Census tracts and add tooltips showing basic information, such as county name, Census tract number, and number and percent of households with fixed connections meeting defined speed levels.
- Add filters to allow users to search by service provider, state and local geography, and speed levels.

- Improve the map's readability and functionality including better zoom and navigation functions; base map options; tract borders; layers that can be turned on/off; an attribute table and option to export data; and filters that allow users to filter by geography, provider, speed tier, etc.

3) Bring the Form 477 broadband adoption data "up-to-date" to be comparable with the latest Form 477 deployment data (i.e. December 2020 data), incorporating the above requested changes; and return the broadband adoption data to a regular bi-annual release schedule made available as close as is feasible to when the data is reported to the FCC.

Respectfully submitted,

/s/

Angela Siefer

Executive Director

National Digital Inclusion Alliance

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